

**From:** Zach Jett  
**Sent:** Thursday, July 24, 2025 11:28 AM  
**To:** Mark Nanavati; AJ Elmes  
**Cc:** Dawn Johnson; James Rodgers; Jennifer Alonzo; James Chapman; W. Ryan Snow; Christopher Jones; Mackenzie Pensyl; Tressa Lucas; Jennifer Huber; Harry Cohen; Siobhan Murphy; Lourdes Keating; Tammy Harris; Rachel Werner; Joslin Vega; Liset Holbert; Michael Roman; AJ Elmes  
**Subject:** Re: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

All,  
I am looping in AJ Elmes from my office, who will attend with Capt. Lewis. His flight will land at 10. Perhaps a 11:30 start time?  
Thank you,  
Zach



**Zachary M. Jett** | Partner

BUTLER WEIHMULLER KATZ CRAIG LLP

11525 N. Community House Road, Suite 300 | Charlotte, NC 28277

Direct [704.940.9806](tel:704.940.9806) | Office [704.543.2321](tel:704.543.2321) | Fax [704.543.2324](tel:704.543.2324)

**PLEASE SEND ALL MAIL TO:** 400 N. Ashley Drive, Suite 2300 | Tampa, FL 33602

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We've moved! Please note our new address

On Jul 24, 2025, at 11:03 AM, Mark Nanavati <[mnanavati@snllaw.com](mailto:mnanavati@snllaw.com)> wrote:

Yes, I think I said Nick can land around 10:00 a.m. If you give an address, I am happy to provide an ETA assuming flight on time.

AJ Elmes from Zach's office will be there as well.

Let me know please.

Mark

Mark C. Nanavati  
(804) 893-3866

---

**From:** Johnson, Dawn <Dawn.Johnson@clydeco.us>  
**Sent:** Thursday, July 24, 2025 11:01 AM  
**To:** Mark Nanavati <mnanavati@snllaw.com>; Rodgers, James <James.Rodgers@clydeco.us>; Alonzo, Jennifer <Jennifer.Alonzo@clydeco.us>; James Chapman <jchapman@cwm-law.com>; W. Ryan Snow <wrsnow@cwm-law.com>; Christopher Jones <cjones@snllaw.com>; Zach Jett <zjett@butler.legal>; Mackenzie Pensyl <mpensyl@cwm-law.com>; Tressa Lucas <tlucas@cwm-law.com>; Jennifer Huber <jhuber@butler.legal>  
**Cc:** Cohen, Harry <Harry.Cohen@clydeco.us>; Murphy, Siobhan <Siobhan.Murphy@clydeco.us>; Keating, Lourdes <Lourdes.Keating@clydeco.us>; Harris, Tammy <Tammy.Harris@clydeco.us>; Werner, Rachel <Rachel.Werner@clydeco.us>; Vega, Joslin <Joslin.Vega@clydeco.us>; Holbert, Liset <Liset.Holbert@clydeco.us>; Roman, Michael <Michael.Roman@clydeco.us>  
**Subject:** Re: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Mark-

Are you confirming definitely that claimants' experts will be attending on Sunday 7/27 for inspection in New York Harbor? If so, what is your estimated ETA to harbor?

If so, then I will let them know that and will provide dock/slip no as soon as its available.

---

**From:** Mark Nanavati <[mnanavati@snllaw.com](mailto:mnanavati@snllaw.com)>  
**Sent:** Wednesday, July 23, 2025 5:30 PM  
**To:** Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>  
**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>  
**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Sunday is the 27th, right?

Sunday good. Address please?

Mark C. Nanavati  
Sinnott, Nuckols & Logan, PC  
(804) 893-3866

----- Original message -----

From: "Johnson, Dawn" <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>

Date: 7/23/25 5:40 PM (GMT-05:00)

To: Mark Nanavati <[mnanavati@snllaw.com](mailto:mnanavati@snllaw.com)>, "Rodgers, James"

<[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>, "Alonzo, Jennifer" <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>, James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>, "W. Ryan Snow" <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>, Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>, Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>, Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>, Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>, Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

Cc: "Cohen, Harry" <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>, "Murphy, Siobhan" <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>, "Keating, Lourdes" <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>, "Harris, Tammy" <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>, "Werner, Rachel" <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>, "Vega, Joslin" <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>, "Holbert, Liset" <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>, "Roman, Michael" <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>, "Alonzo, Jennifer" <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

Subject: RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Thank you. Is 7/29 the final date that claimants have chosen?

---

**From:** Mark Nanavati <[mnanavati@snllaw.com](mailto:mnanavati@snllaw.com)>

**Sent:** Wednesday, July 23, 2025 4:29 PM

**To:** Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

He can get into JFK Sunday at about 10:00 a.m.

Mark

Mark C. Nanavati  
(804) 893-3866

---

**From:** Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>

**Sent:** Wednesday, July 23, 2025 4:53 PM

**To:** Mark Nanavati <[mnnavati@snllaw.com](mailto:mnnavati@snllaw.com)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Mark, figure out your side and let me know definitely asap.

---

**From:** Mark Nanavati <[mnnavati@snllaw.com](mailto:mnnavati@snllaw.com)>

**Sent:** Wednesday, July 23, 2025 3:47 PM

**To:** Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Dawn,

I am on phone with Nick Lewis right now. Travel Saturday is looking tough. Sunday possible (if it works for everyone else)?

Mark

Mark C. Nanavati  
(804) 893-3866

---

**From:** Mark Nanavati

**Sent:** Wednesday, July 23, 2025 2:48 PM

**To:** 'Johnson, Dawn' <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset

<[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Please hold the 26<sup>th</sup> while we confirm travel and the like.

Mark

Mark C. Nanavati  
(804) 893-3866

---

**From:** Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>

**Sent:** Wednesday, July 23, 2025 1:17 PM

**To:** Mark Nanavati <[mnanavati@snllaw.com](mailto:mnanavati@snllaw.com)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Captain Stephenson will be there as well.

---

**From:** Mark Nanavati <[mnanavati@snllaw.com](mailto:mnanavati@snllaw.com)>

**Sent:** Wednesday, July 23, 2025 12:05 PM

**To:** Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Wil check but does that mean the 26<sup>th</sup> and 27<sup>th</sup> are okay too?

Mark C. Nanavati  
(804) 893-3866

---

**From:** Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>

**Sent:** Wednesday, July 23, 2025 1:03 PM

**To:** Mark Nanavati <[mnnavati@snllaw.com](mailto:mnnavati@snllaw.com)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Mark and Jim:

The tug will be available in New York Harbor this Friday, July 25 all day and through the weekend. Can you make Friday, July 25 work?

---

**From:** Mark Nanavati <[mnnavati@snllaw.com](mailto:mnnavati@snllaw.com)>

**Sent:** Friday, July 18, 2025 10:48 AM

**To:** Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Jim,

Right now, July 26, 27 or July 31 are good dates for the tug inspection.

Regarding Captain Lewis and Robert Furborough, are you thinking you will depose them on the same date still? Trying to coordinate date(s) for you.

Thanks,

Mark

Mark C. Nanavati  
(804) 893-3866

---

**From:** Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>

**Sent:** Thursday, July 17, 2025 5:44 PM

**To:** Mark Nanavati <[mnnavati@snllaw.com](mailto:mnnavati@snllaw.com)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>



**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough [CC-US.60032.10679176]

Mark,

Apologies, but I will not need to depose Captain Lewis and Robert Furborough prior to our disclosure (8/8). More importantly, it appears Wi-Fi out at the beach rental is spotty.

Are your experts available 8/7-8/15 via Zoom?

Please let me know.

Thanks.

Yours, etc,  
Jim

James Rodgers  
Senior Counsel | Clyde & Co US LLP  
Direct Dial: +1 212 702 6771 | Mobile: +1 646 853 4277

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**From:** Mark Nanavati <[mnanavati@snllaw.com](mailto:mnanavati@snllaw.com)>

**Sent:** Thursday, July 17, 2025 11:12 AM

**To:** Alonzo, Jennifer <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>; James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>; W. Ryan Snow <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>; Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>; Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>; Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>; Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>; Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

**Cc:** Cohen, Harry <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>; Johnson, Dawn <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>; Rodgers, James <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>; Murphy, Siobhan <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>; Keating, Lourdes <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>; Harris, Tammy <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>; Werner, Rachel <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>; Vega, Joslin <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>; Holbert, Liset <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>; Roman, Michael <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>

**Subject:** RE: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough



Mark C. Nanavati  
Sinnott, Nuckols & Logan, PC

(804) 893-3866

----- Original message -----

From: "Alonzo, Jennifer" <[Jennifer.Alonzo@clydeco.us](mailto:Jennifer.Alonzo@clydeco.us)>

Date: 7/17/25 10:51 AM (GMT-05:00)

To: Mark Nanavati <[mnanavati@snllaw.com](mailto:mnanavati@snllaw.com)>, James Chapman <[jchapman@cwm-law.com](mailto:jchapman@cwm-law.com)>, "W. Ryan Snow" <[wrsnow@cwm-law.com](mailto:wrsnow@cwm-law.com)>, Christopher Jones <[cjones@snllaw.com](mailto:cjones@snllaw.com)>, Zach Jett <[zjett@butler.legal](mailto:zjett@butler.legal)>, Mackenzie Pensyl <[mpensyl@cwm-law.com](mailto:mpensyl@cwm-law.com)>, Tressa Lucas <[tlucas@cwm-law.com](mailto:tlucas@cwm-law.com)>, Jennifer Huber <[jhuber@butler.legal](mailto:jhuber@butler.legal)>

Cc: "Cohen, Harry" <[Harry.Cohen@clydeco.us](mailto:Harry.Cohen@clydeco.us)>, "Johnson, Dawn" <[Dawn.Johnson@clydeco.us](mailto:Dawn.Johnson@clydeco.us)>, "Rodgers, James" <[James.Rodgers@clydeco.us](mailto:James.Rodgers@clydeco.us)>, "Murphy, Siobhan" <[Siobhan.Murphy@clydeco.us](mailto:Siobhan.Murphy@clydeco.us)>, "Keating, Lourdes" <[Lourdes.Keating@clydeco.us](mailto:Lourdes.Keating@clydeco.us)>, "Harris, Tammy" <[Tammy.Harris@clydeco.us](mailto:Tammy.Harris@clydeco.us)>, "Werner, Rachel" <[Rachel.Werner@clydeco.us](mailto:Rachel.Werner@clydeco.us)>, "Vega, Joslin" <[Joslin.Vega@clydeco.us](mailto:Joslin.Vega@clydeco.us)>, "Holbert, Liset" <[Liset.Holbert@clydeco.us](mailto:Liset.Holbert@clydeco.us)>, "Roman, Michael" <[Michael.Roman@clydeco.us](mailto:Michael.Roman@clydeco.us)>

Subject: Carver Marine Towing v. NPBL, et al. - 2:24-cv-00490 - Amended Notices of Deposition of Experts Captain Nicholas Lewis and Robert Furborough

Dear Counsel,

Please find attached the following Amended Notices:

1. Amended Notice of Expert Deposition of Captain Nicholas J. Lewis
2. Amended Notice of Expert Deposition of Robert Furborough – Trident Marine Electronic Inc.

Please be advised that the court reporter will circulate the Zoom link closer to the date of these depositions.

Thank you.

Jennifer Alonzo  
Legal Assistant | Clyde & Co US LLP  
Direct Dial: [+1 312 635 6989](tel:+13126356989)

CLYDE&Co

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